

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

Donald J. Trump, Candidate for President  
of the United States of America,

Plaintiff,

vs.

Case No. 2:-20-cv-01785-BHL

The Wisconsin Elections Commission, and its  
members, Ann S. Jacobs, Mark L. Thomsen,  
Marge Bostelman, Dean Knudson, Robert F.  
Spindell, Jr., in their official capacities, Scott  
McDonell in his official capacity as the Dane  
County Clerk, George L. Christenson in his  
official capacity as the Milwaukee County Clerk,  
Julietta Henry in her official capacity as the  
Milwaukee Election Director, Claire Woodall-  
Vogg in her official capacity as the Executive  
Director of the Milwaukee Election Commission,  
Mayor Tom Barrett, Jim Owczarski, Mayor Satya  
Rhodes-Conway, Maribeth Witzel-Behl, Mayor  
Cory Mason, Tara Coolidge, Mayor John  
Antaramian, Matt Krauter, Mayor Eric Genrich,  
Kris Teske, in their official Capacities; Douglas J.  
La Follette, Wisconsin Secretary of State, in his  
official capacity, and Tony Evers, Governor of  
Wisconsin, in his Official capacity.

Defendants.

**PLAINTIFF'S TENDER OF SIGNED AFFIDAVITS**

Plaintiff Donald J. Trump, by counsel, hereby tenders the signed affidavits of  
Bartholomew R. Williams and David J. Bolton as referenced in the parties' Stipulation of  
Proposed Facts and Exhibits filed with the Court December 10, 2020 (Doc. #127).

Respectfully Submitted,

KROGER, GARDIS & REGAS, LLP

/s/ William Bock, III

William Bock III, Indiana Attorney No. 14777-49

James A. Knauer, Indiana Attorney No. 5436-49

Kevin D. Koons, Indiana Attorney No. 27915-49

ATTORNEYS FOR PLAINTIFF DONALD J. TRUMP

KROGER, GARDIS & REGAS, LLP  
111 Monument Circle, Suite 900  
Indianapolis, IN 46204  
Phone: (317) 692-9000

**CERTIFICATE OF SERVICE**

A copy of the foregoing document was served upon all parties' counsel of record via this Court's CM/ECF service on this 10th day of December, 2020.

/s/ William Bock, III

## **DECLARATION OF BARTHOLOMEW R. WILLIAMS**

1. My name is Bartholomew R. Williams, I am over the age of 18. All facts stated herein are true and based on my personal knowledge;
2. I am a resident of Milwaukee, Wisconsin.
3. I was an independent observer at the Central Count facility for Milwaukee, Wisconsin in the November 3, 2020 election;
4. I arrived at the Milwaukee Central Counting facility at 6 am on Tuesday, November 3, 2020, but was not allowed on the counting floor until 7:30 am. By that time counting had been going on for at least 30 minute;
5. I did not enter or attempt to enter restricted places at Central Count. I did not interfere with the process of ballot processing, nor mark or alter any official record;
6. Claire Woodall-Vogg, Brenda Wood and several supervisors (who did not have name badges) refused to allow me to remain in an unobtrusive area of the ballot processing/counting area from which I could reasonably see and hear what was occurring for the vast majority of the tables being used for counting/processing.
7. Many of the ballot counters were seated so that the observation areas and distances from their seating did not permit me to see the ballots, in some cases at all, but in many, to the extent that I could see any violations of the ballot voting requirements if they existed;
8. I began to create a log of ballots that were visible to me that were subject to challenge, but after 5 entries, I was told that I could not do that by Brenda Wood as it was slowing down the voting. I asked that the names of voters and ballot numbers be called out since I was too far away to read the ballots and that was refused;
9. It was acknowledged to me by Brenda Wood and another supervisor that the election staff had made changes to many of the ballots where a pre-printed 10 day residency statement was crossed out in red ink and changed to 28 days;
10. Claire Woodall-Vogg announced on a loud speaker that challenges concerning the 10 day / 28 day ballot markup would not be allowed;
11. She made a separate announcement that ballot counters who happened on a ballot without a witness address could go to a computer, look the address up and insert it on

the ballot, but there was no mention of any procedure to verify the address;

12. My estimate is that roughly 20% of the ballots had changes marked to the 10/28 day residency statement.

I affirm under the penalties of perjury the foregoing statements are true and correct  
(28 U.S.C. Sec. 1746)

Dated December 10, 2020

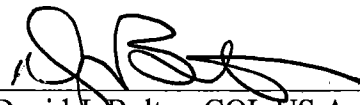
Bartholomew R. Williams  
Bartholomew R. Williams

### DECLARATION OF DAVID J. BOLTER

1. My name is David J. Bolter, I am over the age of 18. All facts stated herein are true and based on my personal knowledge;
2. I am a resident of Milwaukee Wisconsin.
3. I was a paid ballot counter at the Central Count facility for Milwaukee, Wisconsin in the November 3, 2020 election;
4. While working, I saw 100's of ballots with the pre-printed 10 day residency requirement crossed out and filled in with 28 days in red ink;
5. I made objections to ballots with the red ink inserts and cross-outs to Claire Woodall-Vogg, but they were ignored;
6. I objected to writing in unconfirmed witness addresses on ballot envelopes;
7. I saw many ballot envelopes with no signature on the witness signature line, but with a signature on the "assistant" signature line and objected, but Ms. Woodall-Vogg announced the ballot would count as long as there was a second signature on the envelope at all;
8. Many ballot envelopes were already opened or unsealed on arrival, but those ballots were counted over objection;
9. I estimate that as many as 15 to 20% of the ballot envelopes I received had been opened;
10. Election observers were, in my opinion, required to observe from locations that prevented them from seeing much of the ballot counting.

I affirm under the penalties of perjury the foregoing statements are true and correct  
(28 U.S.C. Sec. 1746)

Dated December 10, 2020

  
David J. Bolter, COL US Army(ret)